

REMARKS¹

In the outstanding Office Action (the "Office Action") mailed June 1, 2006, the Examiner objected to claims 4, 11, 14, 21, 27, 33, and 39; rejected claims 4, 5, 21, 22, 33, and 34 under 35 U.S.C. § 112, ¶ 2; rejected claims 1-3, 11-13, 18-20, 27-32, 39-42, 44, 45, and 47 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,774,882 to Keen et al. (hereinafter, "Keen") in view of U.S. Patent No. 6,224,109 to Yang (hereinafter, "Yang");² rejected claims 4, 5, 10, 14, 21, 22, 26, 33, 34, and 38 under 35 U.S.C. § 103(a) as being unpatentable over Keen in view of Yang and in further view of U.S. Patent No. 6,141,759 issued to Braddy (hereinafter, "Braddy"); rejected claims 6, 7, 15, 23, 24, 35, and 36 under 35 U.S.C. § 103(a) as being unpatentable over Keen in view of Yang and Braddy and in further view of U.S. Patent No. 5,239,462 issued to Jones et al. (hereinafter, "Jones"); and rejected claims 43 and 46 under 35 U.S.C. § 103(a) as being unpatentable over Keen in view of Yang and in further view of the article entitled "Welfare Credit Cards Set For Use, Southwest Michigan Begins Using Cards This Week," by Adam Jackson (hereinafter, "Jackson").³

By this amendment, Applicant has canceled claims 1-3, 18-20, and 30-32 without prejudice or disclaimer and amended claims 4-7, 10-11, 14-16, 21-24, 26-27, 33-36, 38-39, and 42-47. Support for the amendments can be found in the specification at, for example, paragraph 083-086 and 092-093. No new matter has been added.

¹ The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicant declines to automatically subscribe to any statement or characterization in the Office Action.

² The Office Action states that claims 12, 28, and 30 are rejected under 35 U.S.C. § 103(a) over Keen in view of Yang. However, at page 6 of the Office Action, the Examiner has taken Official Notice. Accordingly, Applicant will respond to claims 12, 28, and 40 under 35 U.S.C. § 103(a) over Keen in view of Yang and in further view of the Examiner's taking of Official Notice.

³ Applicant notes that the Office Action failed to address claim 8, 9, 16, 17, 25, and 37. Applicant asserts these claims are allowable for at least the reasons stated herein.

Accordingly, claims 4-7, 10-11, 14-16, 21-24, 26-27, 33-36, 38-39, and 42-47 remain pending.

In light of the foregoing amendments and based on the arguments presented below, Applicant respectfully traverse the objection to claims 4, 11, 14, 21, 27, 33, and 39 and the rejections of claims under 35 U.S.C. §§ 102(b) and 103(a), and request allowance of pending claims 4-7, 10-11, 14-16, 21-24, 26-27, 33-36, 38-39, and 42-47.

I. Interview Summary

Applicant acknowledges with appreciation the interview granted to Applicant's representative on August 16, 2006 and the courtesies extended by the Examiner during the interview. At the interview, Applicant's representative and the Examiner discussed (1) the claim objections cited in the Office Action, (2) the terms "credit card driver's license product," "driver's license credit card product," and "identification credit card product," and (3) the alleged combination of the Keen and Yang references.

The Examiner clarified the objection to claims 4, 11, 14, 21, 27, 33, and 39 found on page 2 of the Office Action. Agreement was reached when Applicant's representative agreed to remove all references to DMV in the claims, replacing the term with "driver's license issuing" site as currently recited in amended claims 4, 11, 14, 21, 27, 33, and 39.

The Examiner requested clarification on the "driver's license credit card product," "credit card driver's license product," and "identification credit card product." Applicant believes the recitations found in the claims address the Examiner's concerns. In particular, claims 4, 21, and 33 recite "wherein the credit card driver's license product may be used as a license for operating a motor vehicle and as a credit card to purchase

goods and services." Similarly, claims 42 and 45 recite "wherein the multi-purpose identification credit card product may be used as a credit card to purchase goods and services and as an authorized identification card associated with the government identification card issuing entity."

In addition, Applicant's representatives explained the differences between the cited art and the claims. Applicant's representative asserted that the combination of the Keen and Yang references was legally deficient in that it failed to disclose each and every element of Applicants' claimed invention. While no agreement was reached, Applicant has amended the claims consistent with the discussion.

II. Objection to the Claims

The Examiner objected to claims 4, 11, 14, 21, 27, 33, and 39 for alleged informalities. Office Action, page 2. Applicant has amended claims 4, 11, 14, 21, 27, 33, and 39 consistent with the agreement reached in the August 16 interview. Accordingly, Applicant respectfully requests withdrawal of the objections to claim 4, 11, 14, 21, 27, 33, and 39.

III. Claim Rejections Under 35 U.S.C. § 112, Second Paragraph

Applicant respectfully traverses the rejection of claims 4, 5, 21, 22, 33, and 34 under 35 U.S.C. § 112, second paragraph.

The Office Action asserts that "determining whether the DMV site is capable of processing the request," as recited in claims 4, 5, 21, 22, 33, and 34, "renders the claim indefinite because it is unclear how the determination is made, and what constitutes a DMV site being 'capable of processing a request.'" Office Action, page 3. In addition, the Office Action states that "this phrase [has been given] the broadest reasonable

interpretation, to mean a mental step performed by an operator of the claimed invention before a request is made, wherein the operator would inherently make the determination beforehand, and only forward requests to sites capable of processing said requests.” *Id.*

Applicant reminds the Examiner that “[i]n reviewing a claim for compliance with 35 U.S.C. § 112, second paragraph, the examiner must consider the claim **as a whole** to determine whether the claim apprises one of ordinary skill in the art of its scope....” MPEP § 2173.02, 8th Ed. (Rev. 4), October, 2005 (emphasis added). In addition, “[b]readth of a claim is not to be equated with indefiniteness ... and if applicants have not otherwise indicated that they intend the invention to be of a scope different from that defined in the claims, then the claims comply with 35 U.S.C. 112, second paragraph.” *Id.* at § 2173.04.

While Applicant disagrees with the Examiner’s assertions and characterizations, Applicant has amended the claims to expedite prosecution. Applicant asserts that amended claims 4, 5, 21, 22, 33, and 34, considered as a whole, comply with the requirements of 35 U.S.C. § 112, second paragraph. Therefore, Applicant requests reconsideration and withdrawal of the rejections under 35 U.S.C. § 112, second paragraph.

IV. Claim Rejections Under 35 U.S.C. § 103(a)

The rejection of claims 1-3, 18-20, and 30-32 under 35 U.S.C. § 103(a) over Keen in view of Yang have been rendered moot by the cancellation of those claims. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 1-3, 18-20, and 30-32.

Applicant respectfully traverses the rejection of claims 4-17, 21-29, and 33-47 because the Examiner has not established a *prima facie* case of obviousness as required under 35 U.S.C. § 103(a).

To establish a *prima facie* case of obviousness under 35 U.S.C. § 103(a), each of three requirements must be met. First, the references, taken alone or in combination, must teach or suggest each and every element recited in the claims. See M.P.E.P. § 2143.03 (8th ed. 2001). Second, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to combine the references in a manner resulting in the claimed invention. Third, a reasonable expectation of success must exist. Moreover, each of these requirements must “be found in the prior art, and not be based on applicant’s disclosure.” M.P.E.P. § 2143 (8th ed. 2001).

A *prima facie* case has not been established because, among other things, neither the cited reference, nor any obvious variants thereof, teach or suggest each and every feature of Applicant’s amended claim 4-17, 21-29, and 33-47.

A. Claims 11, 13, 27, 29, 39, 41, 42, 44, 45, and 47

Applicant respectfully traverses the rejections of claims 11, 13, 27, 29, 39, 41, 42, 45, and 47 under 35 U.S.C. § 103(a) over Keen in view of Yang.

The Office Action asserts that “Keen discloses a system and method for real-time electronic inquiry, delivery, and reporting of credit information comprising inherently receiving a request and credit information from the applicant … transferring the credit information to a credit card issuer, receiving an approval response … approving or denying the application for credit based on the information, sending the response to the applicant … and issuing a credit card as a result of the approval.” Office Action, page 4.

The Office Action acknowledges that “Keen fails to teach the credit card being a credit card driver’s license product” *Id.* In addition, Keen fails to teach or suggest

"receiving a credit validation request from a driver's license issuing site, wherein the credit validation request is associated with an applicant applying for a credit card driver's license at the driver's license issuing site" and "**sending [a] credit validation response to the driver's license issuing site**," as recited in amended claims 11 and 39 (emphasis added). Similarly, Keen fails to teach or suggest "**means for receiving a credit validation request from a driver's license issuing site**, wherein the credit validation request is associated with an applicant applying for a credit card driver's license at the driver's license issuing site" and "**means for sending [a] credit validation response to the driver's license issuing site**," as recited in amended claim 27 (emphasis added). Moreover, Keen fails to teach or suggest "**receiving, by a government identification card issuing entity, a request from an applicant to obtain a multi-purpose identification credit card**" and "**creating, at the government identification card issuing entity a multi-purpose identification credit card** based on [an] approval response," as recited in amended claims 42 and 45 (emphasis added).

The Office Action alleges that Yang discloses "a credit card with driver's license being used as a license for operating a motor vehicle and as a credit card to purchase goods and services." Office Action, page 4. Yang appears to teach "[t]he credit card with driver's license is *registered with* a department of motor vehicles in a state in which the owner resides and credit is provided by either an independent financial institution or the state government issuing the driver's license." Yang, column 3, lines 19-23 (emphasis added). Yang further appears to teach that a "front side 11 of the credit card with driver's license includes numerous pieces of information ... [including] the name of

the state 18 issuing the credit card with driver's license 10." *Id.* at column 4, line 60 through column 5, line 2.

However, Yang does not cure the deficiencies set forth above and the failure of Keen to teach or suggest, in conjunction with the other limitations set forth in amended claims 11 and 39, "**receiving a credit validation request from a driver's license issuing site**, wherein the credit validation request is associated with an applicant applying for a credit card driver's license **at the driver's license issuing site**" and "**sending [a] credit validation response to the driver's license issuing site**" (emphasis added). In addition, Yang does not cure the deficiencies set forth above and the failure of Keen to teach or suggest, in conjunction with the other limitations set forth in amended claim 27 "**means for receiving a credit validation request from a driver's license issuing site**, wherein the credit validation request is associated with an applicant applying for a credit card driver's license at the driver's license issuing site" and "**means for sending [a] credit validation response to the driver's license issuing site**" (emphasis added). Moreover, Yang does not cure the deficiencies set forth above and the failure of Keen to teach or suggest, in conjunction with the other limitations set forth in amended claims 42 and 45, "**receiving, by a government identification card issuing entity, a request from an applicant to obtain a multi-purpose identification credit card**" and "**creating, at the government identification card issuing entity a multi-purpose identification credit card based on [an] approval response**" (emphasis added).

For example, Yang fails to teach or suggest a system, method, and computer-readable medium for "*processing requests for a credit card driver's license*," as recited

in amended claims 11, 27, and 39, and “*obtaining* a multi-purpose credit card product,” as recited in amended claims 42 and 45 (emphasis added). Instead, although Yang references a credit card driver’s license, the reference fails to teach or suggest a method for processing a credit card driver’s license as recited in Applicant’s amended claims 11, 27, and 39. Moreover, fails to teach or suggest a method for obtaining a credit card driver’s license as recited in Applicant’s amended claims 42 and 45.

Accordingly, Applicant submits that neither Keen, nor Yang, nor any combination thereof, teach or suggest all the elements of amended claims 11, 27, 39, 42, and 45. Independent claims 11, 27, 39, 42, and 45 are therefore allowable over Keen in view of Yang. In addition, dependent claims 13, 29, 41, 43-44, and 47 are allowable for at least the same reasons as set forth above in connection with their corresponding independent claims 11, 27, 39, 42, and 45.

B. Claims 12, 28, and 40

Applicant respectfully traverses the rejections of claims 12, 28, and 40 under 35 U.S.C. § 103(a) over Keen in view of Yang and in further view of the taking of Official Notice.

The Examiner takes Official Notice, alleging that “**all** credit cards **inherently** have a credit limit, an account number, interest rate, and terms and conditions.” Office Action, page 6 (emphasis added). While Applicant disagrees with this statement, the Examiner’s alleged “well known in the art” teaching does not, *inter alia*, cure the deficiencies set forth above, as well as the failure of Keen, Yang, and any combination thereof, to teach or suggest, in conjunction with the other limitations set forth in amended claims 11 and 39, “**receiving a credit validation request from a driver’s**

license issuing site, wherein the credit validation request is associated with an applicant applying for a credit card driver's license at the driver's license issuing site" and "**sending [a] credit validation response to the driver's license issuing site**" (emphasis added). In addition, the Examiner's alleged "well known in the art" teaching does not, *inter alia*, cure the deficiencies set forth above, as well as the failure of Keen, Yang, and any combination thereof, to teach or suggest, in conjunction with the other limitations set forth in amended claim 27 "**means for receiving a credit validation request from a driver's license issuing site**, wherein the credit validation request is associated with an applicant applying for a credit card driver's license at the driver's license issuing site" and "**means for sending [a] credit validation response to the driver's license issuing site**" (emphasis added). Moreover, the Examiner's alleged "well known in the art" teaching does not, *inter alia*, cure the deficiencies set forth above, as well as the failure of Keen, Yang, and any combination thereof, to teach or suggest, in conjunction with the other limitations set forth in amended claims 42 and 45, "**receiving, by a government identification card issuing entity, a request from an applicant to obtain a multi-purpose identification credit card**" and "**creating, at the government identification card issuing entity a multi-purpose identification credit card based on [an] approval response**" (emphasis added).

Accordingly, Applicant submits that the cited art, taken alone or in combination, fails to teach or suggest all the recitations of claims 12, 28, and 40. Therefore, the rejections of claims 12, 28, and 40 should be withdrawn and the claims allowed.

C. Claims 43 and 46

Applicant respectfully traverses the rejections of claims 43 and 46 under 35 U.S.C. § 103(a) over Keen in view of Yang and in further view of Jackson.

The Office Action states that “Jackson teaches welfare cards, usable for purchase of food items authorized by a government agency, being issued and used in a manner identical to that of a credit card.” Office Action, page 7. Applicant disagrees with the Examiner’s characterization of Jackson. Specifically, Jackson states, “the ... [c]ards will allow users to purchase approved food items at most retailers in the same way credit card users do by swiping their card through an electronic reader in the checkout line.” Jackson, paragraph 5. That is, Jackson discloses a process of paying, i.e., “swiping their card through an electronic reader in the checkout line,” that “allow[s] users to purchase approved food items at most retailers in the same way credit card users do.” *Id.* Jackson does not teach or suggest “welfare cards ... being issued and used in a manner identical to that of a credit card,” as stated in the Office Action at page 8. Furthermore, Jackson appears to teach “the accounts are automatically credited every month.” Jackson, paragraph 10. In other words, Jackson appears to teach that purchases are not made by using a line of credit, but rather by debiting an account associated with the cards.

In addition, Jackson does not, *inter alia*, cure the deficiencies of the cited art set forth above, as well as the failure of Keen, Yang, and any combination thereof, to teach or suggest, in conjunction with the other limitations set forth in amended claims 42 and 45, “receiving, by a government identification card issuing entity, a request from an applicant to obtain a multi-purpose identification credit card” and “creating, at

the government identification card issuing entity a multi-purpose identification credit card based on [an] approval response” (emphasis added).

Accordingly, Applicant submits that neither Keen, nor Yang, nor Jackson, nor any combination thereof, teach or suggest all the elements of claims 43 and 46. Therefore, the rejections of claims 43 and 46 should be withdrawn and the claims allowed.

D. Claims 4, 5, 10, 14, 21, 22, 26, 33, 34, and 38

Applicant respectfully traverses the rejections of claims 4, 5, 10, 14, 21, 22, 26, 33, 34, and 38 under 35 U.S.C. § 103(a) over Keen in view of Yang and in further view of Braddy.

As explained above with respect to claims 11, 13, 27, 29, 39, 41, 42, 45, and 47, Keen appears to teach “an automated security credit checking system for checking a credit application for fraud before a credit card is issued.” Keen, Abstract. Keen fails to teach or suggest at least “receiving a request from an applicant to obtain a credit card driver’s license product, wherein the request is received by a local driver’s license issuing site,” “generating, at the local driver’s license issuing site, a credit validation request based on the request received from the applicant,” “forwarding the credit validation request to a central driver’s license issuing site,” and “determining whether the central driver’s license issuing site is capable of processing the credit validation request, wherein the determination is based on a configuration of a system environment,” as recited in amended claims 4 and 33, and similarly recited in amended claim 21 (emphasis added). Furthermore, Keen fails to teach or suggest “if it is determined that the central driver’s license issuing site is capable of processing the credit validation request, transmitting a response from the central driver’s license

issuing site to the local driver's license issuing site" and "creating, at the local driver's license issuing site, the credit card driver's license product," as further recited in amended claims 4 and 33, and similarly recited in amended claim 21 (emphasis added). In addition, the Office Action acknowledges that "Keen fails to teach the credit card being a credit card driver's license product." Office Action, page 4. Similarly, Keen does not teach a driver's license issuing site.

Yang does not cure the deficiencies set forth above regarding Keen. The Office Action alleges that Yang discloses "a credit card driver's license being used as a license for operating a motor vehicle and as a credit card to purchase goods and services." Office Action, page 4. However, Yang states that "[t]he credit card with driver's license is registered with a department of motor vehicles in a state in which the owner resides and credit is provided by either an independent financial institution or the state government issuing the driver's license." Yang, column 3, lines 19-23 (emphasis added). Yang further states that a "front side 11 of the credit card with driver's license includes numerous pieces of information ... [including] the name of the state 18 issuing the credit card with driver's license 10." *Id.* at column 4, line 60 through column 5, line 2.

However, Yang fails to teach or suggest a system, method, and computer-readable medium for "*obtaining* a credit card driver's license," as recited in amended claims 4, 21, and 33 (emphasis added). More specifically, Yang fails teach or suggest the involvement of the local and/or central driver's license issuing sites in "receiving," "generating," "forwarding," "determining," and "creating" a credit card driver's license product as recited in these claims.

Further, the Office Action acknowledges that "Keen and Yang fail to teach transmitting the request to a credit card issuer if the central DMV site is not capable of processing the request." Office Action, page 7. The Office Action attempts to remedy this deficiency by alleging that "Braddy discloses a system and architecture for distributing, monitoring, and managing information requests on a computer network, wherein a request is sent to a server, and information is examined to determine whether to process the request locally or to forward the request to another system capable of processing the request." *Id.*

However, contrary to the Examiner's assertions, Braddy does not cure the deficiencies set forth above regarding claims 4, 21, and 33. For example, Braddy does not teach or suggest "receiving a request from an applicant to obtain a credit card driver's license product, wherein the request is received by a local driver's license issuing site," "generating, at the local driver's license issuing site, a credit validation request based on the request received from the applicant," "forwarding the credit validation request to a central driver's license issuing site," and "determining whether the central driver's license issuing site is capable of processing the credit validation request, wherein the determination is based on a configuration of a system environment," as recited in amended claims 4 and 33, and similarly recited in amended claim 21 (emphasis added). Furthermore, Braddy fails to teach or suggest "if it is determined that the central driver's license issuing site is capable of processing the credit validation request, transmitting a response from the central driver's license issuing site to the local driver's license issuing site" and "creating, at the local driver's license issuing site, the credit card driver's license product," as further recited in

amended claims 4 and 33, and similarly recited in amended claim 21 (emphasis added). Instead, Braddy merely discloses “a system and architecture for distributing, monitoring, and managing information requests on a computer network” where the “preferred embodiment” has “two major components … the ‘Request Broker’ … and the ‘Application Server.’” Braddy, column 7, line 66 through column 8, line 1 and column 8, lines 16-19. Thus, Braddy is directed towards load management in a client/server system and architecture, and not “*obtaining* a credit card driver’s license,” as recited in amended claims 4, 21, and 33 (emphasis added).

Also, the cited art, alone or in combination, fails to teach or suggest “one or more local driver’s license issuing sites, each for receiving credit validation requests from one or more applicants,” “sending the requests to a central driver’s license issuing site, receiving credit validation responses from the central driver’s license issuing site, and for generating credit card driver’s license products,” as recited in amended claim 14. In addition, the cited art fails to teach or suggest wherein the central driver’s license issuing site receives the credit validation requests,” “sends the credit validation requests to one or more credit card issuers, receives credit validation responses,” and “send the credit validation responses to the one or more local driver’s license issuing sites,” as further recited in amended claim 14.

Accordingly, Applicant submits that neither Keen, nor Yang, nor Braddy, nor any combination thereof, support the rejections of amended claims 4, 14, 21, and 33 under 35 U.S.C. § 103(a). Therefore, the rejections of these claims are legally deficient and should be withdrawn, and the claims allowed. In addition, the rejection of dependent

claims 5, 10, 22, 26, 34, and 38 should be withdrawn for at least the same reasons as set forth above in connection with their corresponding independent claims 4, 21, and 33.

E. Claims 6, 7, 15, 23, 24, 35, and 36

Applicant respectfully traverses the rejections of claims 6, 7, 15, 23, 24, 35, and 36 under 35 U.S.C. § 103(a) over Keen in view of Yang and Braddy and in further view of Jones.

The Office Action alleges that “Jones teaches a method and apparatus for determining the approval status of a potential borrower comprising checking a database to determine whether an applicant is approved for a credit line.” Office Action, page 8. However, Jones does not cure the deficiencies of the cited art set forth above, such as the failure of Keen, Yang, and Braddy to teach or suggest, alone or in combination, “receiving a request from an applicant to obtain a credit card driver’s license product, wherein **the request is received by a local driver’s license issuing site,**” “**generating, at the local driver’s license issuing site, a credit validation request** based on the request received from the applicant,” “**forwarding the credit validation request** to a central driver’s license issuing site,” and “determining whether the central driver’s license issuing site is capable of processing the credit validation request, wherein the determination is based on a configuration of a system environment,” as recited in amended claims 4 and 33 and similarly recited in amended claim 21. Nor does Jones cure the deficiencies of Keen, Yang, and Braddy, and their failure to teach or suggest, at least, “if it is determined that the central driver’s license issuing site is capable of processing the credit validation request, transmitting a response from the central driver’s license issuing to the local driver’s license issuing site” and “**creating, at**

the local driver's license issuing site, the credit card driver's license product," as further recited in claims 4 and 33 and similarly recited in amended claim 21.

Accordingly, Applicant submits that neither Keen, nor Yang, nor Braddy, nor Jones, nor any combination thereof, support the rejections of claims 6, 7, 15, 23, 24, 35 under 35 U.S.C. § 103(a). Therefore, the rejection is legally deficient and should be withdrawn and the claims allowed.

F. Claims 8, 9, 16, 17, 25, and 37

The rejection of claims 8, 9, 16, 17, 25, and 37 is legally deficient because the Examiner failed to address the recitations of these claims.

37 C.F.R. § 1.104(c) requires the Examiner to provide more than merely stating a reference meets the limitations of a rejected claim. "When a reference is complex or shows or describes inventions other than that claimed by the applicant, the particular part relied on must be designated as nearly as practicable. The pertinence of each reference, if not apparent, must be clearly explained and each rejected claim specified."

37 C.F.R. § 1.104(c)(2). In this case, not only are the references asserted by the Examiner complex and describe many different embodiments, the Examiner improperly ignores recitations of claims 8, 9, 16, 17, 25, and 37. As such, the Examiner's rejection of each of these claims under 35 U.S.C. § 103(a), the Examiner must show, *inter alia*, that the applied references, taken alone or in combination, teach or suggest each and every element recited in the claims. MPEP § 2143. Here, by ignoring the recitations of claims 8, 9, 16, 17, 25, and 37, the Examiner has failed to show how the cited art teach or suggest the recitations of these claims. As a result, the rejection of each of these

claims does not meet the requirements of at least MPEP § 2143 and 35 U.S.C. § 103(a), and thus is improper.

Accordingly, the rejection of claims 8, 9, 16, 17, 25, and 37 should be withdrawn and the claims allowed.

V. Conclusion

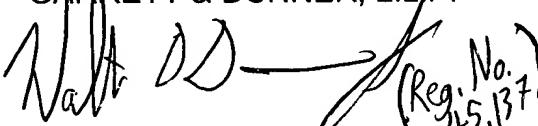
In view of the foregoing amendments and remarks, Applicant respectfully requests reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated: September 1, 2006


By: _____
for Joseph E. Palys
Reg. No. 46,508